



University of Hawaii at Manoa

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May 1, 1985

RG:0060

Planning Commission
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Sirs/Madames:

Proposed General Plan Amendment
Mahukona Resort
North Kohala, Hawaii

In response to a request from Ms. Judy Graham of the Culture and the Historic Sites Committee of the Kohala Community Association, the Environmental Center has conducted a review of the environmental impacts likely to result if the proposed 5,200 unit resort development at Mahukona is implemented. In this review, we have made use of the information presented in the Revised EIS and also the expertise of the following University reviewers: Matthew Spriggs, Anthropology; James Parrish, Hawaii Cooperative Fishery Research Unit; Jacquelin Miller, Julianne Mansur, and Noreen Tashima of the Environmental Center.

We understand that a General Plan amendment will be required for the proposed resort development to change the current agricultural designation to a medium-density urban and resort designation, and that a request for this change is now before the Hawaii County Planning Commission.

In examining previous correspondence and related background information on this project and in particular the Revised EIS, our reviewers have expressed general concurrence with the concerns expressed by the Kohala Community Association in their letter of March 12, 1985 to the Planning Commission, County of Hawaii. As well as the concerns cited in the letter of March 27, 1980 from Mr. Susumu Ono of the Board of Land and Natural Resources to Mr. Sidney Fuke of the Planning Department, County of Hawaii. The two key environmental issues involve the archaeological significance of the area and the potential for significant impacts to the nearshore pristine marine community.

Archaeology and historic preservation

As is stated in the Revised EIS, archaeological reconnaissance surveys, as well as historical accounts, have confirmed the overall cultural and historical significance of the entire coastline of North Kohala. In the original archaeological reconnaissance survey, a total of five properties are cited as owned by the developers. The Revised EIS however, only mentions four. The status of the fifth parcel needs to be clarified. It is part of Kapaa Nui and the land of Kou. If this fifth parcel is to be a part of the development then its archaeological significance should be carefully examined and appropriate restrictions placed on the developers to assure that the significant sites on that parcel are preserved, salvaged or otherwise appropriately noted prior to construction.

Our reviewers have concurred with the recommendations cited in the archaeological report prepared by Bishop Museum, but it is essential that the developer be required to make a formal commitment to implement them. We would also strongly recommend that archaeological surveys be required wherever ground disturbing actions will take place along sewage-main easements and easements for well sites, drilling areas and transmission lines.

Nearshore marine communities

As recognized in the Revised EIS, some of the most "pristine and diverse marine communities exist at Mahukona" (p. V-33). Our major concern lies not with direct effects on the coastal marine life, assuming that the project will "not involve any direct physical or chemical modifications to the nearshore environment" as is stated in the Revised EIS (p. V-33), but instead involves the potential effects of sediment run-off to the coastal marine community during the construction phase of the project. We urge that a sediment control plan, including appropriate monitoring and enforcement procedures, be made a part of any construction contracts so as to adequately protect the coastal marine community.

Concluding remarks

In conclusion given the high potential for significant impacts to the archaeological and nearshore communities we suggest that the economic basis that justifies this development be given careful attention. The economic feasibility studies provided in the revised EIS (1981) are likely to need updating to reflect current conditions. Other resort developments (such as that at Waikoloa) now in the planning and implementation stage along the Kona-Kohala coast call attention to the need for careful consideration of long-term cumulative impacts associated with land-use changes that are contrary to the established General Plan and North Kohala Community Development Plan.

Yours truly,



Doak C. Cox
Director

cc: OEQC
Judy Graham, Kohala Comm. Assn.
Mahukona Properties
Matthew Spriggs
James Parrish
Jacquelin Miller
Juliane Mansur
Noreen Tashima